

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
v.)	Case No. 1:16-CR-209
)	Trial Date: February 5, 2018
DANIEL FLORES-MARAVILLA,)	
)	
Defendant.)	

DEFENDANT FLORES-MARAVILLA PROPOSED JURY INSTRUCTIONS

The Defendant, Daniel Flores-Maravilla, by undersigned counsel, respectfully requests that this Court include in its charge to the jury the following instructions and such other instructions as may become appropriate during the course of the trial. These instructions are found in O'Malley, Grenig and Lee, Federal Jury Practice and Instructions (6th ed. 2015, Volume 1A):

1. Section 10.01. - Opening Instruction
2. Section 10:02. - Pretrial Publicity
3. Section 10:04. - Note-Taking - Permitted
4. Section 11:01. - Admonitions at Court Recesses - Short Form
5. Section 13.07 - Unanimity - Explained
6. Section 14:05. - Statement or Conduct of a Defendant - Accusatory Statements
7. Section 14.09 - Tape Recordings and Typewritten Transcripts
8. Section 15:04. - Credibility of Witnesses - Accomplice
9. Section 15:11. - Credibility of Witnesses - The Refusal of Witness or Defendant to Answer (If Appropriate)
10. Section 20.03 - Verdict - Multiple Defendants - Single or Multiple Counts

11. Section 20:07 - Supplemental Instructions - Response to Questions from the Jury
12. Section 2.8a - Violent Crimes in Aid of Racketeering (Horn, Horn's Federal Criminal Jury Instructions for the Fourth Circuit, 2016 Edition.)

Respectfully submitted,
Daniel Flores-Maravilla
By Counsel

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

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